

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ANNA LASKO,)	CASE NO.:
)	
Plaintiff,)	JUDGE:
)	
vs.)	
)	NOTICE OF REMOVAL
MOBILE HYPERBARIC CENTERS,)	
LLC, et al.,)	
)	
Defendants)	

Mobile Hyperbaric Centers, LLC and Michael N. Huber, M.D. (collectively, “Defendants”), through counsel, respectfully submit this Notice of Removal pursuant to 28 USC §1441 and 28 USC §1446, and state as follows:

1. On February 12, 2019, Plaintiff, Anna Lasko (“Plaintiff”), commenced an action that is pending in the Cuyahoga County Court of Common Pleas, State of Ohio, Case No. CV 19-910916, captioned *Anna Lasko v. Mobile Hyperbaric Centers, LLC, et al.* against Mobile Hyperbaric Centers, LLC and Michael N. Huber, M.D. (collectively “Defendants”). A true and accurate copy of the Complaint is attached here as Exhibit A. Defendants were served with a copy of the Complaint on February 14, 2019, at the earliest.

2. Upon information and belief, Plaintiff is considered a citizen of Pennsylvania. *See* Compl.

3. Defendants are considered citizens of Ohio. *See* Compl.

4. This Notice of Removal is timely filed within thirty days after Defendants’ receipt of the Complaint, in compliance with 28 USC §1446(b)(3).

5. This case is removable under 28 U.S.C. §1441, as this United States District Court has original jurisdiction of this action under 28 U.S.C. §1332(a). Section 1332(a) provides, in pertinent part:

- (a) The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between-

(1) citizens of different States...

6. As stated above, Plaintiff is a citizen of Pennsylvania, and Defendants are considered citizens of Ohio.

7. Upon information and belief, the amount in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs. Accordingly, diversity principles bring this case properly before this Court.

8. Written notice of the removal of this action has been given simultaneously herewith to Plaintiff's counsel and the Court of Common Pleas, Cuyahoga County, Ohio.

9. Pursuant to 28 U.S.C. §1446(a), all process, pleadings, and orders served upon Defendants are attached hereto as Exhibit A.

WHEREFORE, this action is properly removed from the Court of Common Pleas for Cuyahoga County (Case No. CV 19-910916) to the United States District Court for the Northern District of Ohio, Eastern Division for all further proceedings.

Respectfully submitted,

REMINER CO., L.P.A.

/s/ Andrew D. Jamison

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Attorney for Defendants

Mobile Hyperbaric Centers, LLC

and Michael N. Huber, M.D.

CERTIFICATE OF SERVICE

Pursuant to Ohio Civil Rules 5(B)(2)(c) and (f), a copy of the foregoing was sent electronically this 12th day of March 2019, to:

Mark M. Turner, Esq. Attorneys for Plaintiff
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/s/ Andrew D. Jamison
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